

Docket No.

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REMARKS

The Examiner is thanked for his/her careful and very thorough Office Action. No claims are amended at this time, and all claim rejections are respectfully traversed. Favorable reconsideration is respectfully requested.

Claim 1 is reproduced for purposes of discussion:

1. A. distributed switching platform couplable to an Internet Protocol (IP) network, comprising:
  - a main control unit (MCU) couplable to said IP network and configured to generate call and control processing commands;
  - a switching partition couplable to said IP network and including:
    - an input-output distributor (IOD) configured to receive said call and control processing commands in a packet based protocol, and
    - a circuit-switched matrix and line interface coupled to said IOD and configured to provide a sole interface between a plurality of access nodes and said MCU, said IOD configured to convey said call and control processing commands to said circuit-switched matrix and line interface to allow, based thereon, said circuit-switched matrix and line interface to control access to said plurality of access nodes, wherein each connection between said access nodes and said MCU traverses said circuit-switched matrix and line interface.

Applicant respectfully submits that there are significant differences between the claimed innovations in the present application, and the art cited by Examiner, particularly the Andrews reference, USPN 5878130.

The present innovations, in at least one example embodiment, uses an IP network as a communication medium between one or more control units (for example, MCU 110) and a switching partition (for example, partition 145). This use of an IP network between a control unit (or several control units) and a switching partition is not taught or suggested in the Andrews reference.

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For example, Examiner states that Andrews teaches a controller and the switching platform connected to an IP network, citing Andrews at col. 5, lines 20-27. However, the IP network does not appear in the cited figures, which describe "public network, long distance carriers" networks. The Examiner's cited passage states, "It is important to note at the outset that, although not shown in the Figures, each of the conventional long distance carriers 12, 14, 16 includes a long distance control network (e.g., AT&T's Signaling System 7 (SS7) control network, MCI's TCP/IP-based control network, Sprint's X.25-based control network and/or foreign telecommunication's CCITT ss7-based control network) and local exchange carriers." However, these networks are not used in communications between controller 30 and a switching platform. For example, in Figure 1 of Andrews, which that passage partly describes, there is no "switching partition" depicted.

The switching partition is shown in Andrews Figure 12. Examiner equates element 501 in Figure 12 to the switching partition of the present claims. However, it is noted that the collective elements 501 of Figure 12 in Andrews includes Agent Workstations 482 etc., and at least one public network 14 as elements therein. It is respectfully submitted that these elements do not comprise a switching partition, and these elements 501 are described instead as a virtual calling center.

Further, it is noted that Figure 12 does not show an IP network in the configuration claimed. It only shows public network 12, which is not used in communications between the controller 30 and what Examiner describes as the switching partition 501 of Andrews. Instead, the public network is shown as having separate connections to the controller and the virtual call center 501. It is not between them, and does not appear to be used in conveying control signaling between these two entities.

To illustrate this point, Figure 12 of Andrews is shown, along with Figure 1 of the present application.

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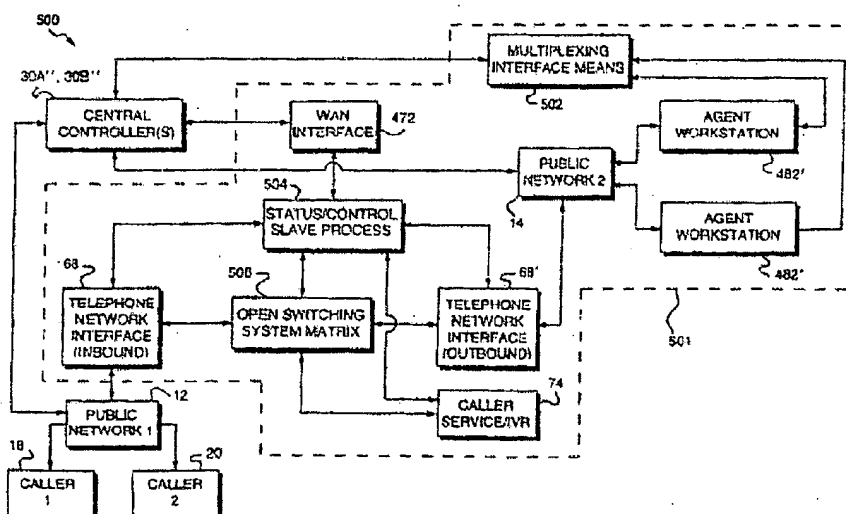


FIG. 12

(Figure 12 of Andrews)

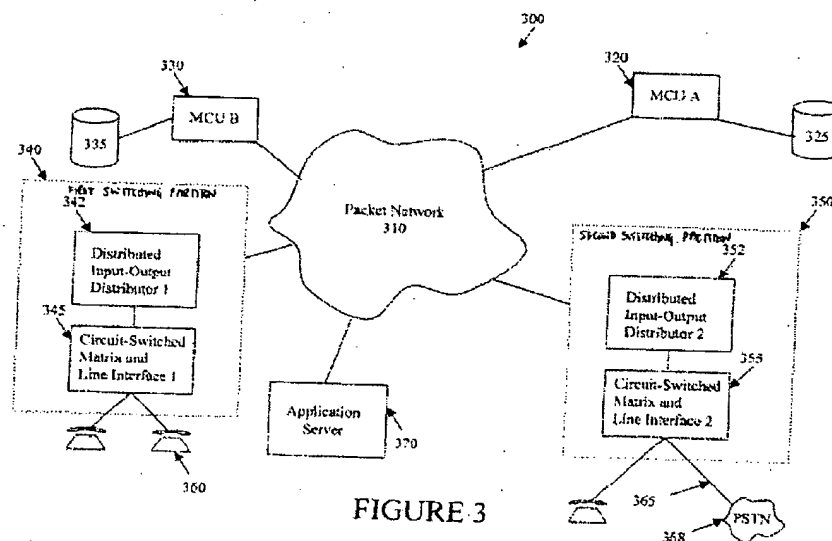


FIGURE 3

(Figure 3 of the present application)

As these figures show, even if the "public network" of Andrews is considered to be an IP network, and even if the virtual call center 501 of

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Andrews is equated with the claimed switching partition (neither of which does Applicant stipulate), the interconnection of Andrews' public network and the controller is inconsistent with the present claims. For example, claim 1 claims, "a circuit-switched matrix and line interface coupled to said IOD and configured to provide a sole interface between a plurality of access nodes and said MCU...." In this example, the access nodes of Andrews (presumably callers 18 and 20) have multiple interfaces with the controller. One of them is directly through public network 12 directly to controller 30, while another is through public network 12 through virtual call center 501, then to controller 30. Therefore, the limitations of claim 1 have not been taught or suggested by the teaching of Andrews.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990).

The arguments presented in favor of claim 1 are also believed to distinguish the other independent claims, all of which are rejected under 35 USC 102 over Andrews. therefore, all independent claims are believed allowable over the cited reference. Likewise, because of their dependency on allowable claims, all dependent claims are believed distinguished over the cited reference. Favorable reconsideration is respectfully requested.

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**Conclusion**

Thus, all grounds of rejection and/or objection are traversed or accommodated, and favorable reconsideration and allowance are respectfully requested. The Examiner is requested to telephone the undersigned attorney or Robert Groover for an interview to resolve any remaining issues.

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Respectfully submitted,



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